

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

JAMES GINDIN,

Plaintiff,

Case No.: 2:18-cv-13235

Hon. Arthur J. Tarnow

v.

JEFF GLOVER & ASSOCIATES, INC.,  
A MICHIGAN CORPORATION, JEFF  
GLOVER, an Individual, JAD SWEIS, an  
Individual, COLBY LOOMIS, an Individual  
AND ANTHONY BERTRAND, an Individual

Defendants.

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LAW OFFICES OF BRADLEY J.  
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and Loomis*  
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DEFENDANTS JEFF GLOVER'S, JEFF GLOVER & ASSOCIATES, INC.'S AND  
COLBY LOOMIS' PRELIMINARY WITNESS LIST

**DEFENDANTS JEFF GLOVER'S, JEFF GLOVER & ASSOCIATES, INC.'S AND  
COLBY LOOMIS' PRELIMINARY WITNESS LIST**

Defendants JEFF GLOVER, JEFF GLOVER & ASSOCIATES, INC. and COLBY LOOMIS, by and through their undersigned counsel, and for their Preliminary Witness List, state as follows:

**WITNESSES<sup>1</sup>**

**I. Parties, including, but not limited to:**

- A. James Gindin
- B. Jeff Glover
- C. Jeff Glover & Associates, Inc.
- D. Jad Sweis
- E. Colby Loomis
- F. Anthony Bertrand

**II. Other Fact or Lay Witnesses, including, but not limited to:**

- A. Friends, family, and/or associates of James Gindin.
- B. Current or potential employers and/or educators of James Gindin.
- C. Any and all agents, employees, or contractors of James Gindin.
- D. Any and all agents, employees, and contractors of Plymouth Canton Realty, LLC

including, but not limited to:

- 1. MaryBeth Kaljian
- E. Any and all agents, employees, and contractors of Keller Williams Realty, Inc.

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<sup>1</sup> References to individuals and/or entities herein may include (whether actual or ostensible) any/all former/current agents, servants, employees, employers, departments, branches, subdivisions, independent contractors, and/or record custodians. Fact witnesses may be called upon to offer expert testimony within the scope of their specialty or specialties.

including, but not limited to:

1. Rene McDonald
  2. Kary Sutter
  3. Kayla Swanson
  4. Cale Woods
  5. Darryl Frost
- F. Taylor Kerrigan
- G. Ariel Toldeo.
- H. Any and all agents, employees, and contractors of Kai Data, LLC.
- I. Any and all agents, employees, and contractors of Real Estate Data Exchange, Inc.
- J. Any and all agents, employees, and contractors of Defendant's Telephone Service Provider(s).

**III. Experts, including, but not limited to:**

A. Specialists in the area of communications, information technology, and/or related fields, including, but not limited to:

1. Ray Horak (expected to testify regarding matters within the scope of his specialties)  
Context Corporation  
1500A East College Way, PMB 443  
Mount Vernon, WA 98273
- B. Any and all specialists/experts utilized by Plaintiff in this matter.
- C. Any and all specialists/experts utilized by any/all co-defendant(s) in this matter.
- D. Any and all necessary rebuttal specialists/experts.
- E. Defendants reserve the right to add supplemental specialists/experts throughout the course of discovery and trial of this matter.

**IV. Miscellaneous witnesses, including, but not limited to:**

- A. All witnesses named in any witness list filed by Plaintiff.



- B. Any and all necessary rebuttal witnesses.
- C. Any and all witnesses that become known up to and through the date of trial.
- D. Any and all individuals named in discovery, including, but not limited to, interrogatories, depositions, pleadings and other documents.
- E. Any and all individuals necessary to authenticate, interpret, identify and/or introduce any and all exhibits.
- F. Defendants reserve the right to supplement its witness list(s) throughout the course of discovery and trial.

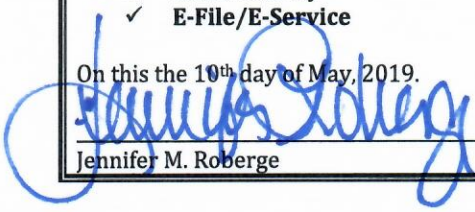
Respectfully submitted,

RICH, CAMPBELL & ROEDER, P.C.

By: 

KENNETH A RICH (P38349)  
RICH, CAMPBELL & ROEDER, PC  
Attorneys for Defendant *Glover, JG&A and Loomis*  
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Dated: May 10, 2019

PROOF OF SERVICE	
UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION	
Case No. 2:18-cv-13235	
The undersigned certifies that a copy of <b>DEFENDANTS JEFF GLOVER'S, JEFF GLOVER &amp; ASSOCIATES, INC.'S AND COLBY LOOMIS' PRELIMINARY WITNESS LIST</b> was served upon all parties of record as to the above cause, to their respective addresses as disclosed on the pleadings of record herein, by:	
<input type="checkbox"/>	Facsimile
<input type="checkbox"/>	Certified Mail (postage prepaid)
<input type="checkbox"/>	Hand Delivery
<input checked="" type="checkbox"/>	E-File/E-Service
On this the 10 <sup>th</sup> day of May, 2019.	
	
Jennifer M. Roberge	